



Town Council

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January 24, 2008

DEIS Comments

Officer in Charge – BRAC

Navy Medicine National Capital Area

8901 Rockville Pike

Bethesda, MD 20889

To Whom It May Concern:

These comments are submitted on behalf of the Town of Chevy Chase in response to the NNMC BRAC DEIS.

Introduction: The Town of Chevy Chase is a residential community located adjacent to downtown Bethesda. Our western border is Wisconsin Avenue and our eastern border is Connecticut Avenue. Traffic congestion, long an issue just north and east of our Town, may worsen and spread because of the recently proposed BRAC Action -- the government-mandated relocation of parts of the Walter Reed Army Medical Center (WRAMC) to the National Naval Medical Center (NNMC) in Bethesda, Maryland, forming the Walter Reed National Military Medical Center (WRNMMC). This may impact the viability and attractiveness of pending private developments along Wisconsin and Woodmont Avenues, as well. To that end, the Town submits the following comments.

Comments: Sam Schwartz PLLC (SSC), a transportation planning and engineering firm in New York City, reviewed the transportation section of the BRAC DEIS at the request of the Town. Attached is their report which expands upon the major points listed below and should be properly addressed before the issuance of a final Environmental Impact Study.

1) A number of assumptions are unclear in the traffic analysis and may not reflect the full impact of the move.

- a. In particular, the growth rate that was used in calculating background traffic was not specified and therefore it is difficult to determine whether future background traffic volumes have been accurately accounted for

and, as a result, whether total estimated traffic volumes are likely to be accurate.

- b. There is also good reason to believe that trip distribution for this BRAC Action may not follow normal patterns and should specifically take into account the existing residential patterns of current civilian WRAMC employees and their likely routes to the new facility, as well as the likely future housing choices of military personnel rotating in. As there is no mention of any of the above factors, it is likely that they were not taken into account for the transportation study. A more accurate trip distribution could alter the calculated Levels of Service (LOS) at various intersections near the NNMC facility.

2) The DEIS states that there will clearly be traffic impacts in the area adjacent to the facility that will be very difficult to mitigate and that will not be financed by the Navy. Where significant impacts are identified – as is the case here – it is necessary to design effective mitigations and for there to be a plan to put them into place. The absence of funding may keep the Department of Defense from directly addressing these problems, but passing the responsibility to the State and County without a commitment by either or both to provide effective mitigations that will be implemented by the opening of WRNNMC may not satisfy environmental requirements, and will certainly create a negative experience for employees, visitors, and area residents.

3) The DEIS does not include any discussion or analysis of the proposed Purple Line nor its projected effects on the modal choice of NNMC employees, patients, and visitors. The DEIS should include an analysis of the Jones Bridge Road BRT alignment in particular, one of the eight Purple Line alternatives being considered by MTA, and the only one that includes a stop at the NNMC facility. This direct service to NNMC via Jones Bridge Road would likely attract more patient, visitor and employee trips and cause a reduction in the projected volume of automobiles accessing the facility. Mitigating road traffic is not limited to road solutions. Shifting trips to transit may lessen traffic impacts, and reduce or eliminate the need for traffic mitigations. Walter Reed's history of transit-encouraging strategies is not carried forward into the DEIS. This failure may affect the validity of DEIS assumptions on transit market share at WRNNMC.

Summary: The Town of Chevy Chase agrees with the assertion in the Draft EIS that the relocation of thousands of employees and hundreds of thousands of annual patients, their families and visitors to the Bethesda Naval Medical Center Campus will pose serious traffic management challenges to the State, County and surrounding communities. We strongly urge the federal, state and county governments to work together to address these issues, rather than each try to place responsibility elsewhere. If such cooperation is not forthcoming, it will be both the community and this national facility that will suffer.

Additionally, we strongly urge that the ongoing BRAC planning process take advantage of the Purple Line planning efforts by the State of Maryland to improve mass transit connections between Silver Spring and Bethesda. If a route that directly connects Silver Spring with NNMC is selected, many of the significant adverse impacts of the BRAC action may be mitigated. It is essential that the parallel but separate conversations of the Purple Line and the BRAC-related traffic be coordinated. Including future Purple Line planning decisions as an element of the BRAC mitigation strategy would be "win-win" in that it would both improve transport between major population centers in Montgomery County and would provide a way of reducing thousands of auto trips to the Medical Center area, without adding to the costs of current BRAC planning scenarios. This approach would permit more effective planning to mitigate the overall environmental impact of the BRAC project at and around the Medical Center campus.

The Town of Chevy Chase is concerned that the failure of the DEIS to consider transit mitigations will create an automobile-access-dependency that will preclude existing and potential area transit customers, and NNMC employees and visitors, from using transit, thereby creating even worse traffic problems and deteriorating the quality-of-life. This need not be. Coincident with this DEIS, MTA is performing an alternatives analysis for the Purple Line. With the potential for WRNNMC to be one of the largest trip generators along the Purple Line, there is a rare opportunity for both parties to factor in this coming change. Direct Purple Line service to NNMC may be the most effective way to maximize the use of transit. We encourage the agencies involved in the traffic mitigation measures for the BRAC Action to address and support a direct connection to NNMC by the Purple Line.

Sincerely,

A handwritten signature in cursive script, appearing to read "Linna Barnes".

Linna Barnes, Mayor
Town of Chevy Chase

CC:

Representative Chris Van Hollen
Lt. Gov. Anthony Brown
Senator Rich Madaleno
Delegate Alfred Carr